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Attorneys for Debtors  
Patrick S. Lane and Sheena Lane

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA

In re

PATRICK S. LANE and SHEENA LANE

Debtor(s).

Case No. 2010-22140  
DC No. JMC-1

**MOTION TO COMPEL ABANDONMENT  
OF PROPERTY OF THE ESTATE 11 USC  
554**

Date: March 3, 2010  
Time: 10:00 a.m.  
Judge: Robert S. Bardwil  
Dept: 34

Debtor(s) move the Court as follows:

1. Debtors scheduled certain business assets in this case in Schedule B, including business equipment. Schedule is provided as Exhibit A.
2. All business assets were claimed exempt in Schedule C, or were over encumbered by secured debt listed on Schedule D. Schedule C is provided as Exhibit B.
3. Patrick S. Lane is self-employed licensed contractor and is the owner of RL Repairs. He is licensed by the State of California and the City of Fairfield to operate his business. The contractor's license and business license are attached hereto as Exhibit C.
4. Debtors believes that all scheduled business assets and operations are of no consequence or burdensome to the estate.

5. Debtors requests the Court to compel the Trustee to abandon all scheduled business assets and operation from the estate.

WHEREFORE, Debtor pray:

1. For an order compelling the Chapter 7 Trustee to abandon said property from the bankruptcy estate; and

2. For other relief the Court deems just and proper.

Dated: February 3, 2010

/s/ Joseph M. Canning  
Joseph M. Canning, Attorney for Patrick S.  
Lane and Sheena Lane